

TEXAS HISTORICAL COMMISSION
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HEI-26066

March 21, 2017

Diana Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: *Project Review under Section 106 of the National Historic Preservation Act, Southwest Gulf Railroad Draft Cultural Resources Report, Medina County, Texas (STB/106, THC #201704530, STB Finance Docket No. 34284)*

Ms. Wood:

On February 21, 2017, we received the *Draft Cultural Resources Report for the Southwest Gulf Railroad Company Construction and Operation of the Proposed Single-Track Railroad*, prepared by HDR, Inc., in accordance with the December 2015 Programmatic Agreement (PA) for the project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The History Programs Division staff, led by Justin Kockritz, has completed its review of the draft report, and for the purpose of compliance with Section 106 of the National Historic Preservation Act, THC concurs that the Upper Quihi Rural Historic District (UQRHD) is **eligible** for listing in the National Register of Historic Places under Criterion A for agriculture and Criterion C for architecture, with a period of significance of circa 1860–1956. The boundaries of the UQRHD as shown in Figure 3.1 appear to be appropriate. THC further concurs that the following properties are **eligible for listing in the National Register**:

- HDR-AR-02, 1253 CR 353—individually eligible under Criterion A for agriculture and Criterion C for architecture, and eligible as a contributing resource to the UQRHD;
- HDR-AR-04, 881 CR 353—individually eligible under Criterion C for architecture, and eligible as a contributing resource to the UQRHD;
- HDR-AR-05, 6005 FM 2676—individually eligible under Criterion C for architecture, and eligible as a contributing resource to the UQRHD;
- HDR-AR-06—eligible as a contributing resource to the UQRHD. The partial ruin of the main dwelling is also individually eligible under Criterion D for its potential to yield information about building technology and construction practices; and,
- HDR-AR-07, 6110 FM 2676—individually eligible under Criterion C for architecture, and eligible as a contributing resource to the UQRHD.

At this time, based on all available information, THC concurs that the following properties are *not* eligible for listing in the National Register, neither individually nor as contributing resources to the UQRHD:

- HDR-AR-01, 1180 CR 353;
- HDR-AR-08, 300 CR 364;
- HDR-AR-09, 6000 FM 2676; and,
- HDR-AR-12, Eastbound US 90 over Union Pacific Railroad.

Unless access is granted to HDR-AR-03 (1040 CR 353), HDR-AR-10 (944 CR 4643), and HDR-AR-11 (830 CR 4643) THC recommends treating these properties as eligible for listing in the National Register and assessing the potential effects of the project.

The Division of Architecture staff, led by Sara Ludueña, has completed its review of the project information provided. Given the eligibility determinations presented in the draft report as well as the proximity of the proposed rail line to many of the eligible resources, THC concurs with the determinations of **ADVERSE EFFECT** presented in the report. As per Stipulation IV of the PA regarding this undertaking, a Resolution Plan should be developed to advance strategies to avoid, minimize, or mitigate adverse effects to historic resources. We look forward to the development of this Plan and are happy to assist and provide feedback in the process.

The Archeology Division review staff, led by Casey Hanson, has completed its review and THC concurs with your recommendations that 41ME258, 41ME259, 41ME262, 41ME263, 41ME265, 41ME266, 41ME267, 41ME268, 41ME269, 41ME270, 41ME271, 41ME272, and Isolated Finds 001ISO001-021ISO004 are *not* eligible for listing in the National Register. THC also concurs with your recommendation for National Register-eligibility testing at sites 41ME260 and 41ME261. THC does not concur with your determination that site 41ME264 is ineligible for listing in the National Register because the site has not been fully evaluated as it may extend onto the adjacent parcel where right-of-entry was not obtained. If access is not granted to the adjacent parcel and a comprehensive eligibility determination for 41ME264 cannot be made, we recommend treating 41ME264 as eligible for listing in the National Register and assessing the potential effects of the project.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our comments on National Register eligibility, please contact Justin Kockritz at 512-936-7403 or justin.kockritz@thc.texas.gov; if you have any questions concerning our comments on the potential effects of the project on historic properties, please contact Sara Ludueña at 512-463-8952 or sara.luducena@thc.texas.gov; or, if you have any questions concerning our comments on archeological resources, please contact Casey Hanson at 512-463-5915 or casey.hanson@thc.texas.gov.

Sincerely,



Justin Kockritz, Historian, Federal Programs
For: Mark Wolfe, State Historic Preservation Officer

cc: Najah Duvall-Gabriel, Advisory Council on Historic Preservation *via email*
David H. Coburn, Steptoe & Johnson, LLP *via email*
Robert Hancock, Chair, Medina County Historical Commission *via email*
Lyn Scott Conrad, Quihi and New Fountain Historical Society
Schweers Historical Foundation
Raymond Hernandez, Tap Pilam-Coahuiltecan Nation *via email*
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Alyne Fitzgerald, Medina County Environmental Action Association *via email*

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